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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

MONDIS TECHNOLOGY LTD.,  
  
Plaintiff,  
  
v.  
  
LG ELECTRONICS INC. and  
LG ELECTRONICS U.S.A., INC.,  
  
Defendants.

Civil Action No. 15-04431(SRC/CLW)

**NOTICE OF MOTION IN LIMINE  
NO. 2 UNDER DAUBERT TO  
PRECLUDE EVIDENCE OR  
ARGUMENTS BY MONDIS'S  
EXPERTS RELATING TO  
COMMERCIAL SUCCESS, AND  
ANY DAMAGES-RELATED  
OPINIONS BASED ON SUCH  
EVIDENCE OR ARGUMENTS**

*Electronically Filed*

**PLEASE TAKE NOTICE** that pursuant to the schedule to be set forth by the Court, the undersigned counsel for Defendants LG Electronics Inc. and LG Electronics U.S.A., Inc. (collectively, "LG"), shall move *in limine* before the Honorable Stanley R. Chesler, U.S.D.J., at the United States District Court for the

District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey, for an Order pursuant to *Daubert* to preclude evidence or arguments by Plaintiff's experts relating to commercial success, and any damages-related opinions based on such evidence or arguments, and disallow Plaintiff from offering any evidence, testimony, or arguments regarding the same.

**PLEASE TAKE FURTHER NOTICE THAT** in support of the within Motion *in limine* No. 2, LG will rely upon its Brief, Declaration of Liza M. Walsh with exhibits attached thereto, and any additional submissions made hereafter. A proposed form of Order is also submitted for the Court's consideration.

Dated: November 28, 2018

Respectfully submitted,

*s/ Liza M. Walsh* \_\_\_\_\_

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